

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALEXANDER CLIFFORD, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

STATUS RESEARCH & DEVELOPMENT  
GMBH, JARRAD HOPE, and CARL BENNETTS,

Defendants.

Case No. 1:20-cv-02815-NRB

Honorable Naomi Reice Buchwald

**[PROPOSED] ORDER APPOINTING LEAD PLAINTIFF  
AND APPROVING SELECTION OF CO-LEAD COUNSEL**

On this \_\_\_\_ day of \_\_\_\_\_ 2020, the Court considered Joel Deutsch's Motion for Appointment as Lead Plaintiff and Approval of Selection of Co-Lead Counsel in the above-captioned action pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §77z-1(a)(3)(B). Having considered the Motion, and the materials submitted in support thereof, the Motion is **GRANTED**.

**IT IS HEREBY ORDERED THAT:**

1. Joel Deutsch is appointed Lead Plaintiff in the above-captioned action.
2. The Court designates the law firms Roche Cyrulnik Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel in this action.
3. Co-Lead Counsel shall be generally responsible for coordinating activities during pretrial proceedings and shall:

- a. Determine and present (in briefs, oral argument, or other fashion as may be appropriate) to the Court and opposing parties the position of Lead Plaintiff and the proposed class on all matters arising during pretrial proceedings;
  - b. Coordinate the conduct of discovery on behalf of Lead Plaintiff and the proposed class consistent with the requirements of Rule 26 of the Federal Rule of Civil Procedure, including preparation of interrogatories and requests for production of documents and the examination of witnesses in depositions;
  - c. Conduct settlement negotiations on behalf of Lead Plaintiff and the proposed class;
  - d. Enter into stipulations with opposing counsel as necessary for the conduct of the litigation;
  - e. Prepare the case for and conduct trial; and
  - f. Perform such other duties as may be incidental to the proper coordination of pretrial and trial activities or authorized by future order of the Court.
4. Co-Lead Counsel will implement and follow procedures to avoid duplication of efforts between the two firms in the prosecution of this action.
  5. All securities class actions raising similar claims subsequently filed in or transferred to the United States District Court for the Southern District of New York shall be consolidated into this action, and this Order shall apply to every such action, absent any further order of the Court.

Dated: \_\_\_\_\_, 2020

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Honorable Naomi Reice Buchwald  
United States District Judge